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**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Justin L. Adams, Postal Inspector of the United States Postal Inspection Service, being duly sworn, state as follows:

**INTRODUCTION**

1. I am a United States Postal Inspector employed by the United States Postal Inspection Service ("USPIS") and have been so employed since February 2014. I am presently assigned to the Cleveland, Ohio Field Office, part of the Pittsburgh Division, and my responsibilities include the investigation of mail and identity-theft related offenses. I have received training in the investigation of financial crimes and mail theft. I have been assigned to the External Crimes Mail Theft team for approximately two years and I am responsible for investigations including those involving mail theft and identity takeovers. I am a federal law enforcement officer authorized to investigate offenses such as violations of Mail Fraud (18 U.S.C. § 1341), Wire Fraud (18 U.S.C. § 1343), Bank Fraud (18 U.S.C. § 1344), and Money Orders (18 U.S.C. § 500).

2. I am an investigative law enforcement officer of the United States within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure. I am engaged in the enforcement of criminal laws included within a category of officers authorized by the Attorney General to request and execute search warrants pursuant to 18 U.S.C. § 3061.

3. The statements contained in this affidavit are based upon my own investigation, information provided by other law enforcement personnel, and information provided by witnesses.

4. Based on the information below, there is probable cause that Clinton Gaynor (“GAYNOR”) and Michael Baker (“BAKER”) engaged in illegal criminal activity including Bank Fraud in violation of Title 18, U.S.C. Section 1344, and Counterfeiting of U.S. Postal Money Orders in violation of Title 18, U.S.C. Section 500. This affidavit is submitted in support of a complaint and arrest warrant for GAYNOR and BAKER.

5. This affidavit contains information necessary to establish probable cause for this application. This affidavit does not include each and every fact and matter observed or known by me regarding this investigation.

6. The investigation to date has revealed a U.S. postal money order fraud scheme in which approximately 131 counterfeit U.S. postal money orders were deposited at various financial institutions in the Northern District of Ohio via Automated Teller Machines (ATMs). Investigation has revealed that a majority of these counterfeit U.S. postal money orders were originally purchased with face values of one to two dollars at various United States Post Offices located in the Northern District of Ohio. After the U.S. postal money orders were purchased, the original dollar amounts were altered to show a face value \$1,000.

7. The investigation revealed that between the approximate dates of July 26, 2014, and August 4, 2015, GAYNOR, BAKER and other unknown co-conspirators created and negotiated multiple counterfeit U.S. postal money orders. These counterfeit money orders were negotiated through several federally insured banks (i.e., Huntington National Bank, Citizen’s Bank, U.S. Bank, and First Merit Bank) and personal accounts belonging to approximately thirty-four individuals. These individuals are suspected to have allowed GAYNOR, BAKER and other co-conspirators to deposit the counterfeit U.S. postal money orders into their financial accounts. Subsequent to the deposit of the counterfeit U.S. postal money orders, GAYNOR,

BAKER and other co-conspirators either: (A) withdrew the proceeds from the counterfeit U.S. postal money orders through ATM transactions; or (B) GAYNOR and BAKER instructed the account holders to withdrawal funds through ATM or in bank transactions. Ultimately, the account holders split the fraudulent proceeds from the counterfeit U.S. postal money orders with GAYNOR, BAKER and/or other co-conspirators.

8. The investigation indicates many of the account holders used were either recruited through an online dating application known as “Jack’d,” or were recruited by individuals who were originally recruited using the online dating application known as “Jack’d.”

#### **Investigation Initiated**

9. On or around March 13, 2015, I learned that eight U.S. postal money orders, each with a face value of one dollar, were purchased on February 19, 2015 and February 23, 2015 at the Willow Branch Post Office located in Cleveland, OH. After the U.S. postal money orders were purchased, the dollar amounts displayed on the U.S. postal money orders were changed from one dollar to \$1,000, and the U.S. postal money orders were deposited into various financial accounts belonging to individuals identified as M.J., C.J., and D.R. (Discussed in further detail below).

10. On or around March 19, 2015, inspectors from the USPIS went to the Willow Branch Post Office to retrieve surveillance videos from February 19, 2015 and February 23, 2015.

11. Displayed in the surveillance videos is a male customer, similar in physical appearance to GAYNOR, who purchased a total of eight one dollar money orders from the Willow Branch Post Office on February 19, 2015 and February 23, 2015.

12. The male customer displayed in the Willow Branch Post Office surveillance videos is observed wearing similar, if not identical, clothing to the male suspect who is observed in ATM surveillance photographs negotiating counterfeit U.S. postal money orders at many of the financial institutions in question.

13. On March 30, 2015, a screenshot of the February 19, 2015 surveillance video was shown to M.J. who identified the male as “Shawn”, the same person who deposited counterfeit money orders into her bank account.

14. On April 1, 2015, a screenshot of the February 19, 2015 surveillance video was shown to D.B. who identified the male as “Tay”, the same person who deposited counterfeit money orders into his bank account.

15. On April 6, 2015, a screenshot of the February 19, 2015 surveillance video was shown to C.J. who identified the male as “Shawn”, the same person who deposited counterfeit money orders into her bank account.

**Huntington National Bank Account Belonging to A.D.**

16. On or around February 17, 2015 and February 20, 2015, three counterfeit U.S. postal money orders were deposited into a Huntington National Bank checking account, # XXX3236 (redacted), belonging to A.D. (whose true identity is known to me).

17. On or around April 13, 2015, I interviewed A.D. at his mother’s residence located in Cleveland, Ohio. A.D. stated he met both “Mitch” and “Shawn” through the online dating website called “Jack’d.” A.D. added that on or around February 15, 2015, “Mitch” and “Shawn” arranged a meeting with A.D. outside of A.D.’s girlfriend, C.J.’s residence. A.D. stated at the time of the meeting, both “Mitch” and “Shawn” stated they recruited individuals on the online dating website “Jack’d” so they could make money. A.D. added that “Mitch” and “Shawn”

stated they were not residents of Ohio and that they needed assistance depositing U.S. postal money orders because they were unable to obtain bank accounts on their own.

18. A.D. stated that following the initial meeting with “Mitch” and “Shawn”, he agreed to assist them by providing his ATM debit card and PIN number and also by conducting transactions on his Huntington National Bank account. A.D. further stated that he also assisted “Mitch” and “Shawn” in depositing U.S. postal money orders into his girlfriend, C.J.’s Huntington National Bank account. A.D. also stated he recruited C.J.’s sister, M.J. (whose true identity is known to me), to help deposit U.S. postal money orders.

19. A.D. said “Mitch” and “Shawn” drove him to a Huntington National Bank (located in the Northern District of Ohio) where they gave him two-\$1,000 U.S. postal money orders to deposit into his account. A.D. was then shown a copy of two counterfeit U.S. postal money orders XXX1084 (redacted) and XXX1073 (redacted) which, had been deposited into his Huntington National Bank account on or around February 17, 2015. A.D. identified his signature on the backs of the U.S. postal money orders and confirmed “Mitch” and “Shawn” had given him the U.S. postal money orders. A.D. added that he received approximately \$800.00 from depositing the two U.S. postal money orders, and that “Mitch” and “Shawn” received the remainder of the proceeds.

20. On or around May 5, 2015, A.D. provided electronic “screen shots” of both “Mitch” and “Shawn” profile accounts which were used to recruit him on the online dating application known as Jack’d. According to A.D., “Mitch” used the Jack’d user name “Mitchy Mitch” and “Shawn” used the Jack’d user name “Tayquan Mr. Diggs.”

21. On or around May 29, 2015, a Postal Inspector displayed a photo lineup to A.D. A.D. identified GAYNOR, with sixty-five percent certainty, as the individual purporting to be

“Shawn.”

22. On or around August 6, 2015, a Postal Inspector displayed a photo lineup to A.D. A.D. identified BAKER, with fifty percent certainty as the individual purporting to be “Mitch.” While viewing the photo lineup, A.D. stated that each time he saw “Mitch” in person, “Mitch” was wearing a hat. A.D. further stated that he would have identified BAKER, with seventy-five percent certainty, as the individual which he identified as “Mitch.” if BAKER was wearing a hat in the photo lineup.

**Huntington National Bank Account Belonging to C.J.**

23. On or around February 19, 2015 and February 23, 2015, two counterfeit U.S. postal money orders were deposited into a Huntington National Bank checking account, XXX9550 (redacted), belonging to C.J. (whose true identity is known to me).

24. On April 6, 2015, Postal Inspectors interviewed C.J. at her mother’s residence located in Cleveland, OH. C.J. stated her boyfriend A.D. had contacted her approximately six weeks prior to the interview and said some of his friends needed assistance cashing U.S. postal money orders. C.J. stated A.D. told her that he had already cashed some of their U.S. postal money orders about two weeks prior and received approximately \$1,000 as payment.

25. C.J. stated that on or about February 19, 2015, she was picked up at the corner of her residential street by A.D. and his two friends. C.J. said the names of A.D.’s friends were “Mitchie” and “Shawn.”

26. C.J. said they all drove to a local Huntington Bank (located in the Northern District of Ohio) and “Mitchie” and “Shawn” provided her with a U.S. postal money order. C.J. was shown a copy of a counterfeit U.S. Postal Money Order XXX1062 (redacted) which had been deposited into her bank account. C.J. identified her signature on the back of the money

order and stated “Mitchie” and Shawn” provided her with the U.S. postal money order. C.J. said she provided her ATM card and PIN number to “Mitchie,” which he used to deposit an altered postal money order into her account using the ATM.

27. C.J. said that on or about February 20, 2015, “Mitchie” and “Shawn” picked her up and drove her back to the ATM to withdraw approximately \$700 from her account.

28. C.J. stated that on or about February 23, 2015, “Mitchie” and “Shawn” picked up her and her sister, M.J. and drove them to deposit more postal money orders. C.J. was shown a copy of a counterfeit U.S. postal money order XXX8910 (redacted) which was deposited into her Huntington National Bank account. C.J. identified her name as the payee on the front and her endorsement signature on the back of the money order. According to C.J., “Shawn” deposited the U.S. postal money order into her account using the ATM.

29. C.J. was shown a time stamped ATM surveillance photograph, dated February 23, 2015, which displayed an individual similar in appearance to GAYNOR in close proximity to the Huntington National Bank ATM on the same date and same time the counterfeit U.S. postal money orders were deposited into the C.J.’s Huntington National Bank account. C.J. identified the individual displayed in the surveillance photograph as “Shawn.”

30. On or about February 24, 2015, C.J. stated she returned to the ATM with her sister M.J., “Mitch”, and “Shawn.” C.J. said “Shawn” told her he could not withdraw the money from inside the bank, so C.J. used her ATM card to withdraw approximately \$700 from her Huntington bank account. C.J. said that in exchange for her assistance she received approximately \$500 of the approximately \$700 withdrawn from her account.

31. On or about May 14, 2015, a Postal Inspector displayed a photo lineup to C.J. C.J. identified GAYNOR, with sixty percent certainty as the individual purporting to be

“Shawn.” At the time the photo lineup was displayed, C.J. stated she would be one hundred percent certain GAYNOR was the individual who purported himself as “Shawn” if GAYNOR’s eyes were open wider in the photograph.

**U.S. Bank Account Belonging to M.J.**

32. On or about February 23, 2015, three counterfeit U.S. postal money orders were deposited into a U.S. Bank checking account, XXX6983 (redacted), belonging to M.J (whose true identity is known to me)

33. On or around March 30, 2015, I interviewed M.J. at her mother’s residence located in Cleveland, OH. M.J said she was first introduced to two males through her sister C.J.’s, boyfriend, A.D. According to M.J., A.D. had informed her how he was able to make money by allowing the two males to deposit U.S. postal money orders into his bank account. M.J. stated sometime in mid-February, A.D. arrived at her mother’s residence with the two males. According to M.J., the two males told her they were looking for individuals who had bank accounts so they could deposit U.S. postal money orders. According to M.J., at the time of the initial meeting, the two males provided her with three \$1,000.00-U.S. postal money orders. M.J. added that she signed the backs of all three U.S. postal money orders.

34. M.J. stated she further agreed to assist the two males by providing her banking card and PIN number, and by conducting transactions for them using her U.S. Bank account. M.J. said that, on or around February 23, 2015, the two males drove C.J., A.D., and her to a local U.S. Bank where “Shawn” deposited three-\$1,000 U.S. postal money orders into her account. M.J. was shown a copy of the three U.S. postal money orders (XXX8921 (redacted)), XXX8932 (redacted), and 8908 (redacted)) which, on or around February 23, 2015, were deposited into her U.S. Bank account. M.J. identified her signature on the backs of the U.S. postal money orders



and stated the U.S. postal money orders were provided to her by A.D.'s two friends.

35. M.J. stated that on or about February 24, 2015, the two males picked her up a second time and drove her to various local U.S. Bank locations, where she was instructed by the two males to withdraw funds representing proceeds from the U.S. postal money orders deposited in her account. M.J. stated she conducted the transactions by entering the U.S. Bank locations where she withdrew the funds. M.J. added she received approximately \$800.00-\$900.00 for permitting the two males to deposit the three U.S. postal money orders into her account, she further stated the two males received the remainder of the money.

36. During her interview, on or about March 30, 2015, M.J. stated that the two males who deposited the counterfeit U.S. postal money orders into her U.S. Bank account are named "Mitch" and "Shawn." M.J. further stated "Mitch" made contact with her using telephone number XXX-0729 (redacted).

#### **Huntington National Bank Account Belonging to A.P.**

37. On or around March 18, 2015 and March 19, 2015, a total of nine counterfeit U.S. postal money orders were deposited into a Huntington National Bank checking account, XXX1876 (redacted), belonging to A.P. (whose true identity is known to me).

38. On or around May 12, 2015, I interviewed A.P. at the USPIS Office located at 2400 Orange Avenue, Cleveland, OH. A.P. said he was first introduced to "Larry" through a friend named A.D. A.P. stated, A.D. had informed him how he, A.D. had made quick money by allowing "Larry" (known to A.D. as "Shawn") and "Mitch" to deposit U.S. postal money orders into A.D.'s financial account. A.P. stated sometime in early-March 2015, A.D. provided "Mitch's" telephone number to A.P., XXX-0729 (redacted). According to A.P., shortly thereafter, he called "Mitch" who referred him to Mitch's cousin "Larry." According to A.P., he

contacted “Larry,” who, on or around March 18, 2015, met him at his residential apartment complex.

39. A.P. stated during the initial meeting on March 18, 2015, “Larry” told him to fill out the front of five \$1,000-U.S. postal money orders with his name, as payee, his address, and to endorse the back of each postal money order. A.P. added that after he filled out the U.S. postal money orders, he and “Larry” deposited the money orders into his, A.P.’s Huntington bank account using an ATM (located in the Northern District of Ohio). A.P. added that when he drove with “Larry” to various ATM’s, he noticed “Larry” had an envelope which contained approximately twenty U.S. postal money orders tucked in the sun visor.

40. A.P. was shown copies of five counterfeit \$1,000-U.S. postal money orders (XXX5507 (redacted), XXX5474 (redacted), XXX5452 (redacted), XXX7102 (redacted), and XXX5496 (redacted)) which, on or around March 18, 2015, had been deposited into his Huntington National Bank account. A.P. identified his handwriting on the fronts and his signature on the backs of the U.S. postal money orders and stated the U.S. postal money orders were given to him to deposit by “Larry.”

41. A.P. was shown ATM surveillance photographs, dated March 18, 2015, which depicted two individuals at or near an ATM, depositing counterfeit U.S. postal money orders into the Huntington National Bank account belonging to A.P. A.P. identified himself and “Larry” as the two individuals displayed in the surveillance photograph.

42. A.P. stated that on or around March 19, 2015, the individual identified as “Larry” went to a Huntington National Bank ATM located in the Northern District of Ohio to deposit four additional \$1,000-U.S. postal money orders into A.P.’s Huntington National Bank account.

A.P. stated “Larry” directed him to fill out the front of the four U.S. postal money orders with A.P.’s name and address and to sign the backs of each U.S. postal money order.

43. A.P. was shown an ATM surveillance photograph, dated March 19, 2015, which displayed an individual wearing clothing similar to the individual depicted in the March 18, 2015 ATM surveillance photograph (mentioned above) depositing four counterfeit U.S. postal money orders into A.P.’s Huntington National Bank account. According to A.P, the individual depicted in the surveillance photograph is “Larry.”

44. A.P. was shown copies of four \$1,000-U.S. postal money orders (XXX7124 (redacted), XXX7091 (redacted), XXX7113 (redacted), and XXX7135 (redacted) which, on or around March 19, 2015, were deposited into his Huntington National Bank account. A.P. identified his handwriting on the fronts, and his signature on the backs of the U.S. postal money orders.

45. A.P. stated that on March 19, 2015, at “Larry’s” direction he went to various Huntington National Banks in the Northern District of Ohio and withdrew approximately \$7,000 from his account which represented proceeds from the counterfeit U.S. postal money orders. According to A.P., from the funds he withdrew, he kept \$1,000 and gave the remainder of the money to “Larry.”

46. On May 15, 2015, a Postal Inspector displayed a photo lineup to A.P. A.P. identified GAYNOR, with one hundred percent certainty, as the individual purporting to be “Larry.”

**Telephone Number XXX-0729 (redacted)**

47. As discussed above, both M.J. and A.P. stated the individual who represented himself as “Mitch” contacted them with telephone number XXX-0729 (redacted).

48. On or around April 28, 2015, a Bank of America Investigator verified that on or around December 13, 2014, BAKER opened a Bank of America personal account. According to the Bank of America Investigator, BAKER provided telephone number XXX-0729 (redacted) when he established the account.

49. On or around July 31, 2015, members of the Mentor Ohio Police Department provided Affiant a report, #TRD1404909, for a motor vehicle accident which occurred on November 11, 2014, in which BAKER and GAYNOR were occupants of the same vehicle. Subsequent to the accident BAKER, the driver of the vehicle provided the responding officer a Georgia driver's license #XXX2824 (redacted), with his name on it. Additionally, BAKER provided his telephone number, XXX-0729 (redacted) to the responding officer.

50. On or around December 16, 2015, I received information from the online dating website called "Jack'd," which contained messages between the user name "Mitchy Mitch" and other Jack'd user accounts. In several of the messages, user name "Mitchy Mitch" references the fraud scheme described above. In some messages, user name "Mitchy Mitch" provided the telephone number XXX-0729 (redacted) to other "Jack'd" users for the purpose of contacting him.

#### **U.S. Bank Account Belonging to D.B**

51. On or around February 25, 2015, a total of three counterfeit U.S. postal money orders were deposited into a U.S. Bank checking account, XXX6986 (redacted), belonging to D.B. (whose true identity is known to me).

52. On or around April 1, 2015, I interviewed D.B. at his residence in Cleveland, OH. D.B. said he first met "Tay" on the online dating website called "Jack'd." D.B. added that on or around February 19, 2015, "Tay" sent D.B. a message to his "Jack'd" account and asked D.B. if

he wanted to make some money. "Tay" offered D.B. \$1,000 if D.B. allowed "Tay" to deposit U.S. postal money orders into D.B.'s bank account. D.B. agreed, and provided "Tay" his residential address and telephone number to arrange a meeting. Shortly thereafter, D.B. stated "Tay" contacted him by telephone. D.B. stated subsequent to speaking with "Tay," a white female arrived at D.B.'s residence, with three \$1,000 U.S. postal money orders. D.B. further added that the female called "Tay" from D.B.'s residence and put "Tay" on speaker phone so D.B. could speak directly with "Tay." Following the conversation, D.B. stated he signed the backs of the U.S. postal money orders and provided the female his U.S. Bank debit card and PIN number.

53. During the interview, D.B. was shown copies of three \$1,000 U.S. postal money orders (XXX7817 (redacted), XXX7828 (redacted), and XXX7830 (redacted)) which, on or around February 25, 2015, were deposited into his U.S. Bank account. D.B. identified his signature on the backs of the U.S. postal money orders. D.B. added that the U.S. postal money order copies were identical in appearance to the U.S. postal money orders the unidentified female provided him to sign before being deposited.

54. Subsequent to providing his bank account information to the female, D.B. stated the three U.S. postal money orders were deposited into his U.S. Bank account. On February 25, 2015, D.B. stated "Tay" contacted him, and requested that D.B. meet him. According to D.B., "Tay" originally requested to meet him at the Bureau of Motor Vehicles (BMV) located in Parma because "Tay" stated he needed to get a driver's license. D.B. stated on or around February 26, 2015, D.B. agreed to meet "Tay" at a U.S. Bank located inside a Dave's grocery store. D.B. stated at "Tay's" direction he withdrew \$2,000 from his U.S. Bank account and gave the funds to "Tay." D.B. said that "Tay" provided him with a \$1,000 U.S. postal money order as

payment for withdrawing the funds from his bank account. I have since confirmed the \$1,000 U.S. postal money order provided to D.B. was counterfeit.

55. As discussed above, D.B. stated that on February 25, 2015 "Tay" requested a meeting at the BMV located in Parma, OH. D.B. added that "Tay" informed him that he, "Tay" needed to get a new driver's license. I conducted a search on GAYNOR in the Law Enforcement Database known as OHLEG. According to the search results, GAYNOR was issued a temporary driver's license, on February 25, 2015. An Investigator with the BMV later confirmed the temporary driver's license was obtained from the Parma Branch location.

56. On or around April 14, 2015, D.B. sent Affiant a "screen shot" of "Tay's" profile page from the online application called "Jack'd." According to the profile picture, "Tay" was using the Jack'd user profile name "Tayquan Mr. Diggs" when he recruited D.B. As mentioned above, this was the same profile user name of the individual whom A.D. stated recruited him off the online dating application called "Jack'd."

57. On or around April 14, 2015, D.B. sent Affiant "screen shots" of messages sent between him and the Jack'd account user, "Tayquan Mr. Diggs." Included in the correspondence are messages from the Jack'd user "Tayquan Mr. Diggs" to D.B. where "Tayquan Mr. Diggs" asked D.B., "You gotta bank card," "What bank are you with," and "What's your phone number. [sic]"

58. On or about May 13, 2015, a Postal Inspector displayed a photo lineup to D.B. D.B. identified GAYNOR, with one hundred percent certainty, as the individual purporting to be "Tay."

**First Merit Bank Account Belonging to D.R.**

59. On or around February 26, 2015, three counterfeit U.S. postal money orders were deposited into a First Merit checking account, XXX5764 (redacted), belonging to D.R. (whose true identity is known to me).

60. On or around May 20, 2015, I interviewed D.R. at the Postal Inspection Service Cleveland Field Office. During the interview, D.R. said he first met a male (name unknown) on the online dating website called "Jack'd." D.R. added that approximately two to three weeks after he established a Jack'd account, a male sent him a message to his account and asked him if he wanted to make some money. According to D.R., the male offered him \$1,000 if he allowed the male to deposit U.S. postal money orders into D.R.'s bank account. D.R. said a few days later the male contacted him, via telephone, and requested to meet.

61. D.R. said that during the initial meeting, two African American males picked him up at his past place of employment, a business called Dave's that is located on Payne Rd, Cleveland, OH, and took D.R. to his house to get his ATM card. According to D.R., he could not locate his ATM card at that time.

62. D.R. stated after the initial meeting, he met with one of the same males who told him to fill out the front of three \$1,000-U.S. postal money orders with his name and address and to sign the backs of each. D.R. added that after he filled out the U.S. postal money orders, he gave the male his First Merit Bank ATM card and PIN number so the male could deposit the U.S. postal money orders into D.R.'s bank account. D.R. added that the male was unsuccessful in obtaining funds from the U.S. postal money orders which had been deposited into D.R.'s First Merit Bank account.

63. D.R. was shown copies of three counterfeit \$1,000-U.S. postal money orders (XXX7841 (redacted), XXX8954 (redacted), and XXX8987 (redacted)) which, on or around February 26, 2015, were deposited into D.R.'s First Merit Bank account. D.R. identified his handwriting on the fronts and his endorsement signature on the backs of the U.S. postal money orders.

64. D.R. said in addition to allowing the male to deposit U.S. postal money orders into his First Merit Bank account, the male also drove him to a United States Post Office located on East 55<sup>th</sup> Street, Cleveland, OH for D.R. to purchase one dollar money orders. According to D.R., on or around February 26, 2015, he purchased approximately five to eight U.S. postal money orders with face values of one dollar each.

65. Investigation has revealed that all the one dollar U.S. postal money orders D.R. purchased on February 26, 2015 were deposited into various bank accounts belonging to other individuals who are also suspected to be involved in the scheme. The face value amounts on all these U.S. postal money orders so deposited were raised from \$1.00 to \$1,000.00 prior to deposit.

66. When interviewed, D.R. was shown a photo lineup by a U.S. Postal Inspector. After reviewing the photo lineups, D.R. identified GAYNOR, with ninety-five percent certainty, as the individual: (A) who provided him the counterfeit U.S. postal money orders to fill-out; (B) who deposited the U.S. postal money orders into his account; and (C) instructed him to enter a United States Post Office to purchase multiple one dollar money orders.

67. D.R. said approximately one week prior to the date of the interview, his friend M.J. (whose true identity is known to me) contacted him, via telephone, and attempted to recruit D.R. to allow the males to deposit U.S. postal money orders into his account. D.R. stated that



M.J. told him he, M.J. had already made \$1,000 from allowing his account to be used to deposit U.S. postal money orders. According to D.R., M.J. was unaware that he, D.R. had already been involved in the scheme.

**Citizens Bank Account Belonging to M.J**

68. On or around March 26, 2015 and April 2, 2015, a total of six counterfeit U.S. postal money orders were deposited into a Citizen's Bank checking account, XXX8904 (redacted) belonging to M.J (whose true identity is known to me).

69. On or around August 10, 2015, I interviewed M.J. at the Postal Inspection Service Cleveland Field Office. M.J. said he first met "Jay" on the online dating application called "Jack'd." M.J. stated around March 2015, "Jay" sent him a message to his "Jack'd" account and asked M.J. if he wanted to make some money. According to M.J., "Jay" offered him \$1,000 if he allowed "Jay" to deposit U.S. postal money orders into M.J.'s financial account. M.J. stated he agreed to the use of his account, and provided "Jay" his telephone number so they could arrange a meeting. M.J. stated that shortly thereafter, "Jay" contacted him by telephone. M.J. stated subsequent to speaking with "Jay" on the phone, they communicated again via text message, and on or around March 26, 2015 they met at the Giant Eagle grocery store parking lot located on Buckeye Road, Cleveland, OH. M.J. said that during this first meeting "Jay" was with another African American male.

70. M.J. stated that during the initial meeting on or around March 26, 2015, "Jay" told him to fill out the front of three \$1,000-U.S. postal money orders with his name and address and to sign the backs of each. M.J. added that after he filled out the U.S. postal money orders, he and "Jay" went into the Giant Eagle grocery store (located in the Northern District of Ohio) and deposited the money orders into his bank account via the ATM.

71. M.J. was shown copies of three counterfeit \$1,000-U.S. postal money orders (XXX7080 (redacted), XXX7078 (redacted), and XXX7067 (redacted)) which, on or around March 26, 2015, were deposited into his Citizen's Bank account. M.J. identified his handwriting on the fronts and his endorsement signature on the backs of the U.S. postal money orders.

72. M.J. stated that on or around March 27, 2015, at the direction of "Jay", he went to the Citizen's Bank located inside the Giant Eagle grocery store on Buckeye Road, Cleveland, OH and withdrew the \$3,000 of the proceeds from the counterfeit U.S. postal money orders. According to M.J., he kept \$1,000 and gave the remainder of the funds to "Jay."

73. On or around April 2, 2015, M.J. stated he and "Jay" went to a Citizen's Bank ATM located at University Circle, Cleveland, OH to deposit three additional U.S. postal money orders. M.J. stated "Jay" told him to fill out the front of three \$1,000 U.S. postal money orders with his name and address and to sign the backs of each.

74. M.J. was shown copies of three \$1,000-U.S. postal money orders (XXX1842 (redacted), XXX1831 (redacted), and XXX1820 (redacted)) which, on or around April 2, 2015, had been deposited into his Citizen's Bank account. M.J. identified his endorsement signature on the backs of the U.S. postal money orders.

75. M.J. stated he tried to recruit his friend D.R. and co-worker Mike (last name unknown) to allow "Jay" to deposit U.S. postal money orders into their bank accounts. M.J. stated that D.R. refused because he had already been recruited to participate in the scheme and he was already under investigation, and Mike (LNU) refused because he did not feel comfortable.

76. M.J. was presented a photo lineup by a Postal Inspector. After reviewing the photo lineup, M.J. identified GAYNOR, with one hundred percent certainty, as the individual purported to be "Jay."

**Interview of A.L.**

77. On or around October 7, 2015, I interviewed A.L (whose true identity is known to me) outside her father's residence located in Cleveland, OH. The interview pertained to four U.S. postal money orders (serial numbers: XXX8792 (redacted), XXX8803 (redacted), XXX8814 (redacted), XXX8825 (redacted) which A.L purchased from a post office, each with a face value of one dollar, on or around July 31, 2015, which were later deposited into various bank accounts after the face values were changed to \$1,000.

78. A.L. stated she was contacted by a male who asked her if she wanted to make some money. According to A.L, the male stated that to make the money she had to go to a post office and purchase four U.S. postal money orders for one dollar. A.L. stated she agreed and on July 31, 2015 went to a post office located on the west side of Cleveland, OH to purchase four one dollar U.S. postal money orders.

79. On July 31, 2015, subsequent to purchasing the U.S. postal money orders with face values of one dollar each, A.L stated she was contacted by the same male who had contacted her earlier, and a meeting was arranged at the Burger King restaurant located at Steelyard Plaza, Cleveland, OH. A.L stated when she arrived at the Burger King restaurant she met with two African American males. According to A.L., during the meeting, the four, one dollar U.S. postal money orders were provided to a male who stated his name was "Mitch." A.L added that the second male with "Mitch" was a dark skinned black male who did not speak to her, but she observed his facial features.

80. A.L stated after "Mitch" was provided the four one dollar U.S. postal money orders, "Mitch" attempted to pay her with a \$500.00 U.S. postal money order instead of paying her in cash. A.L stated she declined the money order because she did not feel right about the

situation and as a result, she did not receive payment for going to the post office and purchasing the U.S. postal money orders. According to A.L. “Mitch” asked A.L. to provide him with her PIN number and account information so “Mitch” could deposit the “checks” into her account. According to A.L., “Mitch” stated he would pay A.L. \$4,000.00 for access to her account so that “Mitch” could deposit the checks. According to A.L., she declined “Mitch’s” offer.

81. At the time of the interview, A.L. was presented two photo lineups which were displayed by a U.S. Postal Inspector. After reviewing the first photo lineup A.L. was able to identify GAYNOR, with one hundred percent certainty, as the male who had accompanied “Mitch”. After reviewing the second photo lineup presented, A.L. was able to identify BAKER, with one hundred percent certainty, as the individual who referred to himself as “Mitch.” A.L. added “Mitch” told her that “he prints the checks.”


#### **Arrest of GAYNOR and BAKER**

82. On or around December 9, 2015, GAYNOR and BAKER were arrested by and are in the custody of the Conyers, Georgia Police Department (CGPD) for fraud related offenses. According Conyers Police Report #15-081466, members of the Conyers Police Department located inside the suspect’s vehicle, a black bag containing a laptop computer and blank printable checks. To the best of Affiant’s knowledge the CGPD have not searched the laptop computer and Affiant is waiting to obtain photos relating to the arrest, which will include photos of the checks.

1:16 MJ 9026

CONCLUSION

83. Based on the foregoing facts, Affiant respectfully submit that probable cause exists showing that between on or about July 26, 2014, and on or about August 4, 2015, CLINTON GAYNOR and MICHAEL BAKER engaged in the above-described bank fraud and counterfeit-U.S. postal money order scheme in violation of Title 18, United States Code, Sections 1344 and 500.

  
Justin L. Adams, Postal Inspector  
U.S. Postal Inspection Service  
Cleveland, Ohio

Subscribed and sworn to before me this 27th day of January 2016.

  
William H. Baughman Jr.  
United States Magistrate Judge